

HAVEN LEGAL SERVICES
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In Pro Per

FILED
U.S. Bankruptcy Court
Western District of NC
JUN 16 2017
Steven T. Seale, Clerk
Charlotte Division
CCH

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA – CHARLOTTE DISTRICT

In re:

TANYA L. MATTESON

CASE NO.: 17-30550

Chapter 13

**RESPONSIVE DECLARATION
FOR HAVEN LEGAL SERVICES
IN LIEU OF PERSONAL
APPEARANCE AND/OR A
REQUEST FOR PERMISSION TO
APPEAR TELEPHONICALLY TO
ORDER FOR APPEARANCE AND
TO SHOW CAUSE ORDER WHY
IT SHOULD NOT BE
SANCTIONED**

(SUPPORTING DECLARATION)

DATE: June 14 14, 2017

TIME: 2:00 p.m.

PLACE: U.S. Bankruptcy Court

Charles R. Jonas Federal Building

401 West Trade Street

Courtroom 1-5

Charlotte, NC 28202

HAVEN LEGAL SERVICES, ("HLS") I, a small online internet services provider
that assists homeowners across the continental and next door, hereby submits this
Response Declaration to the Motion to Show Cause Order Requiring a

RESPONSE TO ORDER TO APPEAR AND SHOW CAUSE REQUIRING A
REPRESENTATIVE OF HAVEN LEGAL SERVICES TO APPEAR AND SHOW CAUSE
WHY IT SHOULD NOT BE SANCTIONED

1 Representative of Haven Legal Services to Appear and Show Cause Why It Should
2 Not Be Sanctioned filed by the UNITED STATES BANKRUPTCY
3 ADMINISTRATOR, ("USBA").
4

5 DECLARATION OF HAVEN LEGAL SERVICES REPRESENTATIVE
6 I, Rita Thomas, declare:

7 1. I am the authorized person doing an online services business as Haven
8 Legal Services ("HLS") and if called upon to testify in these proceedings, I will
9 competently and truthfully do so. This declaration is offered in lieu of personal
10 appearance due to the nature of online communication business across the
11 continental United States and expense, time, logistics being located 2,423 miles
12 from this court, and medical restrictions on an ability to make a physical
13 appearance, or alternatively, I seek permission of the court to make a telephonic
14 appearance in accord with local rules.

15 2. On or about April 5, 2017, the Debtor, Tanya Matteson ("Ms. Matteson")
16 became a online electronic client of HLS, when Ms. Matteson sought consulting
17 services to save the family home from a wrongful foreclosure. There was no HLS
18 contract or payment to HLS for involvement in this bankruptcy. The HLS
19 consulting contract terms are limited to pre foreclosure complaint investigation and
20 negotiations as set forth in the attached Exhibit "A" addendum to her consulting
21 contract.

22 3. Our files have no information for services in this matter. I investigated
23 and found no information as to Ms. Matteson's contacts, family and friends who
24 she sought to help her. She did not retain HLS for bankruptcy and further did not
25 pay HLS for involvement in this Chapter 13 Bankruptcy. She only paid a partial
26 fee of \$700.00 and breached the initial \$1000.00 payment terms stated under
27 Haven consulting agreement for the foreclosure negotiation services for a review
28 of home loan negotiations, analysis and audit.

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4. There was no agreement and no payment to Haven for participation in this bankruptcy.

5. There was no intent for involvement in this proceeding. I request that the request for sanction be denied as the signed contract is for other services and no funds were received for this matter.

6. I submit this declaration in lieu of an appearance due to the logistics and inability to appear in person and/or request a telephonic or written inquiry in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Ontario, California this 8th of June 2017.


Rita Thomas

Authorized Representative
Haven Legal Services

EXHIBIT A

EXHIBIT 1 HLS CONSULTING AGREEMENT

APPENDIX A. PAGE @ [PREVIOUSLY FILED ON 5/16/2016]

- Prepare a Qualified Written Request to receive bank documents
- Provide Detailed Analysis & Extensive Audit of All Instruments
- Research to Locate Trust and Trust Information Concerning the Securitization and Pooling & Service Agreement
- Obtain Basic Information and Summary of Securities, Status of Trust, Interest Accrual, Trust Profits, and Other Matters Applicable to the Trust and the Property
- Prepare a Civil Lawsuit Complaint with Causes of Action Concerning:
 - Breach of Contract, Slander of Title, Wrongful Foreclosure, Securitization, Unlawful Business Practices, Fraud, Unjust Enrichment, Conveyance, with Request for Rescission of Trustee's Deed (Upon Trustee's Non-Judicial Foreclosure Sale)
- Request for Quiet Title
- Request Cancellation of Certain Recorded Instruments
- Request Declaratory Relief
- Request and Offer of True Modification of Terms and Conditions of the Alleged Loan with Fixed Terms and Rate of Interest and with a Reduction of the Loan Balance upon Accurate Accounting Assessment
- Request for an Injunction
- Preparation of Summons and Civil Cover Sheet with Preparation
- Labeling, Tabbing and numbering all Exhibits to Complaint with Pagination
- Prepare Temporary Restraining Order and for An Order to Show Cause Re Preliminary Injunction and All Supporting Pleadings Subject Thereto.
- Service of Complaint, Summons, Other Initial Case Commencement Documents
- Upon Receipt of any Responsive Pleadings by the Defendants, for Applicable Options to Proceed
- Provide a limited scope one-time appearance attorney for eviction defense and/or settlement. All courts require a filing fee. HLS will prepare a fee waiver, which if the court accepts; the client will not be required to pay a filing fee. However, HLS does not guarantee the client being absolved of a filing fee.

RESPONSE TO ORDER TO APPEAR AND SHOW CAUSE REQUIRING A REPRESENTATIVE OF HAVEN LEGAL SERVICES TO APPEAR AND SHOW CAUSE WHY IT SHOULD NOT BE SANCTIONED

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- Rescission Attempt including but not limited to the following services:
 - a) Draft, prepare, and submit a complete rescission package
 - b) Follow up with Foreclosing Trustee and Lender to decision (Lenders and trustees prolong the rescission process more complaints will be lodged with the appropriate organizations)
 - c) If rescission is denied a lender will provide a detailed denial letter to client. This will be the path as to how or what issues need to be rectified in order to establish a successful rescission
- Resubmission loan assistance package and assist client during second review process. If it becomes apparent after several months in process that there is no possibilities of the lender providing a workout option with the client, the file will be referred to an "In House" attorney to discuss the possibilities of civil litigation, bankruptcy, and/or a short sale.

CERTIFICATE OF SERVICE

The undersigned certifies that the document or pleading to which this certificate is attached was served upon the parties to this action listed below by depositing a copy of the same, enclosed in a first class postpaid, properly addressed wrapper, in a Post Office or official depository under the exclusive care and custody of the United States Postal Service or by electronic service by the Clerk of the bankruptcy court through the ECF system on June 9, 2017.

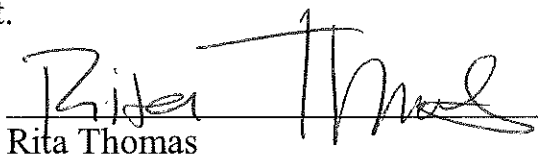
Tanya L. Matteson
13314 Pontchatrain Ave.
Charlotte, NC 28273

Warren L. Tadlock
Vis Electronic Service Only

Alexandria P. Kenny
US Bankruptcy Administrator
Via Electronic Service Only
Aexandria_p_kenny@ncwba.uscourts.gov

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: June 9, 2017


Rita Thomas

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